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Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PEGGY PRUCHNICKI, and all similarly
situated individuals,

Plaintiff,

v.

ENVISION HEALTHCARE
CORPORATION d/b/a ENVISION
HEALTHCARE, EMCARE, INC., and
SHERIDAN HEALTHCORP, INC.,

Defendants.

Case No.: 2:19-cv-01193-JCM-BMW

**STIPULATION AND ORDER
CONTINUING HEARING ON MOTION
TO STAY AND ON AMENDED
PROPOSED DISCOVERY PLAN AND
SCHEDULING ORDER TO JANUARY
28, 2020**

[First Request]

Pursuant to Local Rule IA 6-1, Defendants Envision Healthcare Corporation d/b/a Envision Healthcare (“Envision”), EmCare, Inc. (“EmCare”), and Sheridan Healthcorp, Inc. (“Sheridan”) (collectively, “Envision Defendants”) and Plaintiff Peggy Pruchnicki (“Plaintiff”), hereby stipulate and agree to, and respectfully request that the Court, continue the hearing on the

Envision Defendants' Motion to Stay and on the Amended Proposed Discovery Plan and Scheduling Order from January 21, 2020 to January 28, 2020. This is the Parties' first request for a continuance of this hearing date.

1. On July 8, 2019, the Envision Defendants removed this action from the Eighth Judicial District Court of Clark County Nevada to this Court. [ECF No. 1.]

2. On July 29, 2019, the Envision Defendants filed their Motion to Dismiss Plaintiff's First Amended Complaint. [ECF No. 18.]

3. After meeting and conferring, the parties filed on August 21, 2019 a Stipulation to allow Plaintiff to file her Second Amended Complaint. [ECF No. 22.]

4. On August 26, 2019, the Court granted the parties stipulation to allow Plaintiff to file her Second Amended Complaint. [ECF No. 24.]

5. That same day, Plaintiff filed her Second Amended Complaint. [ECF No. 26.]

6. On September 9, 2019, the Envision Defendants filed their Motion to Dismiss Plaintiff's Second Amended Complaint [ECF No. 27] and their Motion to Stay Discovery pending resolution of their Motion Dismiss Plaintiff's Second Amended Complaint ("Motion to Stay") [ECF No. 28].

7. On September 23, 2019, Plaintiff filed her Opposition to the Envision Defendants' Motion to Dismiss Plaintiff's Second Amended Complaint [ECF No. 31] and her Opposition to the Envision Defendants' Motion to Stay [ECF No. 32].

8. On September 30, 2019, the Envision Defendants filed their Reply in Support of their Motion to Stay. [ECF No. 35.]

9. On November 18, 2019, the Court issued a minute order, setting the hearing on the Envision Defendants' Motion to Stay and on the Amended Proposed Discovery Plan and Scheduling Order for January 21, 2020 at 9:00 a.m. in LV Courtroom 3B. [ECF No. 40.]

10. Counsel for the Envision Defendants has a scheduling conflict on January 21, 2020 and, therefore, is unable to attend the January 21, 2020.

11. Counsel for the Envision Defendants contacted the clerk of the Court to request additional dates on which the hearing could be held. The clerk of the Court provided January 28,

2020 as an alternative date for the hearing.

12. Counsel for the Envision Defendants then contacted counsel for Plaintiff to determine (1) if he would agree to continue the hearing date and (2) if he was available on January 28, 2020. Counsel for Plaintiff stated that he was available on January 28, 2020 and that he would agree to continue the hearing to that date.

13. This request is for good cause and is not for the purposes of delay.

14. The Parties have not previously requested any extensions to the January 21, 2020 hearing date.

IT IS SO STIPULATED.

DATED this 21st day of November, 2019.

KNEPPER & CLARK LLC

By: /s/ Miles N. Clark

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Attorneys for Plaintiff

DATED this 21st day of November, 2019.

BAKER & HOSTETLER LLP

By: /s/ Matthew D. Pearson

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Attorneys for Defendants

IT IS ORDERED that the hearing set for 1/21/2020 at 9:00 a.m. is VACATED and CONTINUED to 1/28/2020 at 9:00 a.m.

IT IS SO ORDERED

DATED: November 22, 2019

